

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

ALDO VERA, JR., as Personal Representative
of the Estate of Aldo Vera, Sr.,

Plaintiff,

v.

THE REPUBLIC OF CUBA,

Defendant.

Case No. 12 Civ. 1596 (AKH-I)

**NOTICE OF MOTION TO VACATE THE JUDGMENT
FOR LACK OF SUBJECT MATTER JURISDICTION, TO
ACCOUNT FOR ALL FUNDS RECEIVED, AND TO DISGORGE**

PLEASE TAKE NOTICE, that upon the Motion to Vacate the Judgment for Lack of Subject Matter Jurisdiction, to Account for All Funds Received, and to Disgorge, and the accompanying Memorandum in Support, Intervenor, Alfredo Villoldo and Gustavo E. Villoldo, individually, and as Administrator, Executor, and Personal Representative of the Estate of Gustavo Villoldo Argilagos, move this Court for an order vacating the judgment and striking it from the public records for lack of subject matter jurisdiction and requiring Aldo Vera, Jr. to account for all funds received by the Estate and disgorge the same.

Dated: June 18, 2013

/s Andrew C. Hall

Andrew C. Hall, Esq.*

Brandon R. Levitt (BL1028)

HALL, LAMB AND HALL P.A.

2665 South Bayshore Drive, PH1

Miami, Florida 33133

Tel.: (305) 374-5030

Fax: (305) 374-5033

* admitted *pro hac vice*

and

Edward H. Rosenthal, Esq.
Beth I. Goldman, Esq.
FRANKFURT KURNIT KLEIN & SELZ, P.C.
488 Madison Avenue, 10th Floor
New York, New York 10022
Tel.: (212) 980-0120
Fax: (212) 593-9175

*Attorneys for Alfredo Villoldo, individually, and
Gustavo E. Villoldo, individually, and as
Administrator, Executor, and Personal
Representative of the Estate of Gustavo Villoldo
Argilagos*